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*Counsel for Defendant BUILD OUR CENTER*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

DREW RIBAR,

Plaintiff,

Case No. 3:24-cv-00526

v.

WASHOE COUNTY; WASHOE COUNTY  
LIBRARY SYSTEM; JEFF SCOTT; THANH  
NGUYEN; JAMIE HEMINGWAY; BEATE  
WEINERT; STACY MCKENZIE; JONNICA  
BOWEN; BEN WEST; BUILD OUR  
CENTER, INC.; STACEY SPAIN;  
ANGELINE PETERSON; CHRISTOPHER  
DANIELS; DEPUTIES ROTHKIN, SAPIDA,  
GOMEZ; KRISTEN RYAN, JENNIFER  
COLE; and JOHN/JANE DOES 1-10;

Defendants.

**DEFENDANT BUILD OUR  
CENTER'S RESPONSE TO  
PLAINTIFF DREW RIBAR'S  
SUPPLEMENTAL NOTICE OF  
EVIDENCE OF COORDINATED  
MISREPRESENTATIONS BY  
DEFENSE COUNSEL AND  
WASHOE COUNTY**

Defendant BUILD OUR CENTER, INC., by and through its undersigned counsel, respectfully files this response to *Plaintiff's Supplemental Notice of Evidence of Coordinated Misrepresentation by Defense Counsel and Washoe County* ("Supplemental Notice") [ECF 138].

This Response is made and based upon all records and pleadings on file herein, together with every exhibit attached hereto (each of which is incorporated herein by reference), as well as the points and authorities set forth directly below.

In support of this Response, BOC states as follows:

**MEMORANDUM OF POINTS AND AUTHORITIES**

To the extent a response is necessary to *Plaintiff's Supplemental Notice of Evidence of Coordinated Misrepresentation By Defense Counsel and Washoe County* [ECF 138], BOC responds as follows:

1 First, Mr. Ribar is precluded from filing a supplement without leave of  
 2 court. LR 7-29(g). “A party may not file supplemental pleadings, briefs,  
 3 authorities, or evidence without leave of court granted for good cause. The judge  
 4 may strike supplemental filings made without leave of court.” *Id.* He has not  
 5 requested leave of court to file any supplements; therefore, the Court should  
 6 strike his Supplemental Notice.

7 Second, the Supplemental Notice concerns an incident at the Washoe  
 8 County Library Board of Trustees Meeting on September 17, 2025, in which BOC  
 9 was not involved. That meeting is entirely unrelated to Mr. Ribar’s underlying  
 10 lawsuit and the filing serves only as further evidence of his unfounded belief in  
 11 a government conspiracy to target him.

12 As such, the Court should consider Mr. Ribar’s Supplemental Notice as  
 13 improper, another frivolous filing in a long line of vexatious filings by this *pro se*  
 14 Plaintiff.

15 DATED September 30, 2025. SIERRA CREST BUSINESS LAW GROUP

16  
 17 /s/ Alison R. Kertis, Esq.  
 By: \_\_\_\_\_  
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 22 Counsel for Defendant Build Our Center  
 23  
 24  
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 26  
 27  
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**CERTIFICATE OF SERVICE**

I certify that I am an employee of the SIERRA CREST BUSINESS LAW GROUP who, on the below-written date, caused a true copy of the foregoing to be transmitted via email and also to be filed using the above-entitled Court's electronic filing (CM/ECF) system which will automatically e-serve the same) on the person(s) and/or entity(ies) set forth directly below:

**Drew Ribar**

480 Pershing Lane, Washoe Valley, NV 89704  
(775) 223-7899  
const2audit@gmail.com  
*Plaintiff in propria persona*

**Lindsay L. Liddell** (SBN 14079)

**Andrew Cobi Burnett** (SBN 16505)

DEPUTY DISTRICT ATTORNEYS

One South Sierra Street Reno, NV 89501

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cburnett@da.washoecounty.gov

(775) 337-5700

*Counsel for Plaintiffs Washoe County and its Library System, Jeff Scott, Stacy Mckenzie, Jonnica Bowen, Jennifer Cole; Deputy C. Rothkin, Deputy R. Sapida, and Sgt. George Gomez*

DATED: September 30, 2025.

/s/ Monica R. Leazer

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an employee of the  
SIERRA CREST BUSINESS LAW GROUP

**INDEX OF EXHIBITS**

to

DEFENDANT BUILD OUR CENTER'S RESPONSE TO  
 PLAINTIFF DREW RIBAR'S SUPPLEMENTAL NOTICE OF  
 EVIDENCE OF COORDINATED MISREPRESENTATIONS  
 BY DEFENSE COUNSEL AND WASHOE COUNTY

re

*Ribar vs. Washoe County, et alia*  
*(Case No. 3:24-cv-00526)*

<b>Exhibit No.</b>	<b>Exhibit Description</b>	<b>Pages (+ Cover)</b>
	None,	
	Not applicable.	